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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO COUNTY

ROBERT JORDAN, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

MONDELEZ GLOBAL LLC, a Delaware
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CIVSB2202758

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: February 20, 2024

Time: 8:30 a.m.

Dept.: S26

Complaint Filed: February 4, 2022

Trial Date: None Set

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I, Larry W. Lee, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, counsel of record for Plaintiff Robert Jordan (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am one of the primary attorneys on this matter. Based on my own independent investigation and evaluation, I am of the opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class Action Settlement (“Settlement Agreement” or “Agreement”) is fair, reasonable, and adequate and is in the best interests of the Class, in light of all known facts and circumstances and the expenses and risks inherent in litigation.

3. My office was retained based upon a contingency fee arrangement wherein Class Counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiff failed to prevail in the matter, Class Counsel would have spent a significant amount of time, money and other resources without any benefit or return. For instance, my office has expended costs to file the instant action, effect service of process, pay mediation fees and other litigation related costs. In addition, had Plaintiff also failed to prevail in the present cases, Defendant may have sought to recover costs in connection with their defense of the case.

4. Class Counsel are experienced and well-qualified class action litigators who have litigated many wage and hour class actions and have each been certified as class counsel in numerous other class actions, particularly wage and hour class actions.

5. My qualifications are as follows: I received my J.D. from Arizona State University College of Law in 2003. During law school, I was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude from Arizona State University College of Law in the top 10% of my class. While I was in law school, I was the Associate Managing Editor of the Arizona State University College of Law, Law Journal. Upon graduation, I practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that represents a significant number of Fortune 500

1 companies.

2 6. My firm's primary focus is employment law. I have handled a number of wage and
3 hour matters including class actions and multiple-plaintiff actions. I have a practice that
4 encompasses cases throughout the State of California, including but not limited to the Los Angeles
5 Superior Court, Orange County Superior Court, San Francisco County Superior Court, San Diego
6 County Superior Court, and the United States District Courts for the Central, Eastern, and Northern
7 Districts of California.

8 7. I have been named as Class Counsel in a number of class actions that have been
9 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
10 Francisco County, and the United States District Court for the Central District of California,
11 including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
12 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
13 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
14 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
15 Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS Corp. et al.*, Judicial
16 Council Coordination Proceeding No. 4539.

17 8. To date, I have incurred approximately 38.90 hours in connection with the litigation
18 of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred to date.

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9. As of January 1, 2024, my hourly rate in class and representative actions is \$ 900 per hour. I have previously been approved at an hourly rate of \$850 by various courts in a number of matters, including most recently in *Audycki v. Stanford Health Care*, Santa Clara Superior Court Case No. 19CV347173 and *Palomino v. Northrop Grumman Systems Corporation*, Santa Clara Superior Court Case No. 19CV345534. Accordingly, the total lodestar for my hours will be approximately \$35,010 (38.90 hours x \$ 900).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 25, 2024, at Los Angeles, California.



Larry W. Lee

EXHIBIT A

Larry W. Lee Time and Task Chart
Robert Jordan v. Mondelez Global LLC et. al.
Superior Court of California, County of San Bernardino Case No. CIVSB2202758

Hours	Description of Work
3.20	Review client documents; research background of Defendant; research potential causes of action and viability of same.
1.50	Review and revise class action complaint and PAGA letter; confer with co-counsel re same.
3.80	Investigate potential overlap with related matter of <i>Henry Saucedo v. Mondelez Global LLC</i> ; confer with co-counsel re scope of <i>Saucedo</i> class action.
1.10	Review and revise complaint in PAGA action; confer with co-counsel re same.
1.70	Review and revise first set of written discovery.
2.40	Confer with co-counsel re stipulation to consolidate class and PAGA actions; legal research re grounds to oppose potential removal of consolidated action to federal court; review and revise stipulation re consolidation.
3.40	Review and analyze class action settlement in <i>Zamarripa v. Mondelez Global, LLC</i> ; confer with co-counsel re <i>Zamarripa</i> release.
1.30	Review and revise second set of discovery requests
2.80	Legal research re viability of rounding claim; confer with co-counsel re same.
.40	Confer with co-counsel re selection of mediator and scheduling mediation.
5.30	Review and revise mediation brief; legal research re same; review class data and damages analysis; confer with co-counsel re mediation strategy.
2.10	Review and revise MOU; confer with co-counsel re terms of proposed release.
4.10	Review and revise long form settlement documents; confer with co-counsel re same.
3.20	Review and revise motion for preliminary approval and supporting documents; confer with co-counsel re same.
.70	Confer with co-counsel re hearing on preliminary approval.
1.90	Review and revise motion for final approval and supporting documents; confer with co-counsel re same.
38.90	TOTAL